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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MINA DE ORO, LLC, a Nevada limited liability company; THE TOY CHEST, LLC a Nevada limited liability company,

Plaintiffs,

v.

MATTHEW BRENT GOETTSCHE, an individual, JOBEDIAH SINCLAIR WEEKS, an individual, JOSEPH FRANK ABEL, an individual, SILVIU CATALIN BALACI, an individual, BITCLUB, an unknown entity, and DOE and ROE Corporations,

Defendants.

Case No: 2:20-cv-00994

**APPLICATION FOR DEFAULT JUDGMENT AGAINST DEFENDANT JOBEDIAH SINCLAIR WEEKS**

Plaintiffs, MINA DE ORO, LLC, and THE TOY CHEST, LLC, (hereinafter "Plaintiff"), by and through their counsel, the KERR SIMPSON ATTORNEYS AT LAW, hereby apply to this Court for Default Judgment Against Defendant JOBEDIAH SINCLAIR WEEKS, (hereafter "Weeks") in this case.

This Application is made pursuant to FRCP 55 on the grounds that a Default has been entered against said Defendant for failure to answer or otherwise defend against the allegations in the Complaint filed by the Plaintiff, and that said Defendant is not in the military service of the

1 United States nor an infant or incompetent person. **Declaration of C. Robert Peterson, Esq., Ex.**  
2 **“1”.**

3 In support of this Application, Plaintiff relies on the Declaration of Counsel attached  
4 hereto, and all records, papers, files and pleadings on file herein.

5 Dated this 13th day of March, 2023.

7 KERR SIMPSON ATTORNEYS AT LAW

8 /s. C. Robert Peterson

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**MEMORANDUM OF POINTS AND AUTHORITIES**

Through this Default Judgment Application, Plaintiffs ask this Court to award damages to Plaintiffs for Breach of Contract, Violation of 17 CFR 240.10B-5, Violations of NRS 90.570 et. Seq., Fraud and Fraudulent Inducement and Unjust Enrichment in the amount of \$250,000.00 for Plaintiff Mina De Oro, LLC and \$250,000.00 for Plaintiff The Toy Chest, LLC. **Declaration of Manager of Mina De Oro, LLC, Ex. “2” and Declaration of Manager of The Toy Chest, LLC, Ex. “3”.**

Defendant JOBEDIAH SINCLAIR WEEKS was served April 18, 2022. **Dkt. 33.** Default was entered against him on March 9, 2023. Mr. Weeks has made no appearance in this case. Based on the foregoing, Plaintiffs seek a default judgment against Mr. Weeks in the amount of \$250,000 in favor of each Plaintiff. This amount represents the amount paid by Plaintiff to Defendants as a result of Mr. Week’s fraud and breach of contract as set forth in Plaintiffs’ Complaint **Dkt. 1 at p.2-12.**

DATED: March 13, 2023.

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/s. C. Robert Peterson

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